

25Oct01

To: Dr. William S. Stokes, Director
National Institute of Environmental Health Sciences

Thank you for soliciting comments from the public on the use of non-animal methods to study the toxic effects of chemicals from acute exposure.

I feel very strongly that these non-animal methods SHOULD REPLACE all animal testing.

Animal tests not only are cruel to the animals, but nearly irrelevant to humans because they lead to inaccurate and misleading results. They are also needlessly costly and excessively time-consuming, leading to human deaths that could have been avoided. Animal tests have never been proven to be scientifically reliable or relevant to humans.

One form of lethal dose testing, the LD50, is gradually being phased out internationally. It should be replaced by non-animal studies, not other animal-poisoning tests. Twenty years is more than enough time for non-animal tests to have proven themselves.

At the very minimum, all government agencies now requiring the acute animal-poisoning tests should immediately incorporate the in-vitro cell culture method as a transitional means of reducing the number of animals killed, and should support the use of non-animal testing as an eventual replacement for lethal-dose testing.

Sincerely,
Robin Frames
Independent Journalist